

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA

v.

JEREMY SETH TUMMINS

Docket: 3:10-CR-00009

Judge Trauger

RESPONSE TO GOVERNMENT’S MOTIONS IN LIMINE

Response To Government’s Motion In Limine # 1 Document 138

COMES now Jeremy Seth Tummins, by and through undersigned counsel, Jennifer Lynn Thompson, and in response to the Government’s Motion in Limine #1, Counsel would state that she filed an corresponding but opposite proposition in paragraph 13 of her Motion in Limine. Counsel believes that this issue is appropriate for a hearing.

Response To Government’s Motion In Limine # 2 Document 139

In response to the Government’s Motion in Limine #2, Counsel would state that she filed an corresponding but opposite proposition in paragraphs 16, 17, and 18 of her Motion in Limine. Counsel believes that this issue is appropriate for a hearing.

Response To Government’s Motion In Limine # 3 Document 140

In response to the Government’s Motion in Limine #3, Counsel would state four of the five alleged child pornography images introduced by the

Government at the previous trial were unconfirmed and only suspected child pornography. Therefore, the issue of whether or not the images were of people under the age of 18 was a central issue before the jury. Evidence that there are very similar pornography images of women who look young but are over the age of 18 is very relevant to this case. Counsel believes that this issue is appropriate for a hearing.

Response To Government's Motion In Limine # 5 (FILED UNDER SEAL)

Counsel agrees to comply with Federal Rule of Evidence 608. Counsel believes that this issue is appropriate for a hearing at which time Counsel intends to call witnesses and present proof supporting any allegations so that the entire issue may be litigated before the day of trial.

Respectfully submitted,
/s/ Jennifer Lynn Thompson
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been delivered through the Court's electronic filing system to the following at the time of filing:

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On this day, April 7, 2015

/s/ Jennifer Lynn Thompson
Jennifer Lynn Thompson